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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CASE NO.: 09-45340-RFN
GUILLERMO CASTILLO	§	
and	§	CHAPTER 13
MARIA DELGADO CASTILLO,	§	

	§	
Movant	§	
	§	
vs	§	HEARING DATE ON MOTION:
	§	
GUILLERMO CASTILLO	§	March 16, 2011 at 1:30 pm
and	§	
MARIA DELGADO CASTILLO,	§	

**DEBTORS' MOTION FOR RECONSIDERATION OF MOTION
FOR RELIEF FROM AUTOMATIC STAY OR IN THE ALTERNATIVE
TO SET ASIDE NOTICE OF TERMINATION OF STAY**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW, GUILLERMO CASTILLO and MARIA DELGADO CASTILLO ,
Debtors in the above styled and numbered cause, and files this Motion for Reconsideration of
Motion for Relief from Automatic Stay or in the Alternative to Set Aside Notice of Termination
of Stay; and in support hereof would respectfully show the Court as follows:

I.

Debtors filed for protection under Chapter 13 of the Title 11 of the United States
Bankruptcy Code on August 31, 2009. Tim Truman is the Standing Chapter 13 Trustee in this
case.

II.

The Court maintains jurisdiction over this proceeding pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(g).

III.

On or about April 16, 2010, filed its Motion for Relief from Automatic Stay for delinquent payments. In an effort to resolve this matter, the parties agreed to submit to an Agreed Order Conditioning the Automatic Stay, ("Agreed Order"), subsequently entered by this Court on May 19, 2010.

VI.

Debtors do believe that they have defaulted under the Agreed Order, but explain why by and through the enclosed affidavit (Exhibit A) and respectfully requests that this Court reinstate the stay.

V.

It was necessary for the undersigned counsel to file this motion to protect the interest and rights of the debtor.

WHEREFORE, PREMISES CONSIDERED, Debtors pray the Court to grant the Motion for Reconsideration of Motion for Relief from Automatic Stay and Certificate of Default for the purposes stated herein; and for such other and further relief the Court may deem Debtor(s) justly entitled.

Respectfully submitted,

/s/ George M. Barnes
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NOTICE OF HEARING

You are hereby notified of the filing of the Motion to Reinstate and the “**Notice of Hearing Thereon**” for the reasons therein stated will be held on before the Honorable **Russell F Nelms** at the U.S. Courthouse, **501 W. Tenth Street, Fort Worth, Texas 76102**. Creditors are not required to attend the hearing unless they object to the Motion.

/s/ George M. Barnes
George M. Barnes

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Motion to Reconsider Dismissal**, was forwarded to all persons of interest and to Tim Truman, Chapter 13 Trustee at 6851 N.E. Loop 820, Ste. 300, Fort Worth, TX 76180-6608 by US Mail or electronically on February 22, 2011.

/s/ George M. Barnes
George M. Barnes